

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Loriann Smith Morelli
Cosimo Morelli

Debtors

Chapter 13

Bankruptcy No.23-11701-PMM

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTORS

AND NOW comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to provide required documentation as to expenses as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

The Plan does not provide sufficient funding to allow the minimum compensation to the standing trustee provided in 11 U.S.C. Section 330 (c).

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee